

**Federal Defenders
OF NEW YORK, INC.**

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Southern District
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David E. Patton
Executive Director

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Grant Grandison
21 Cr. 00001 (KMW)

April 9, 2021

USDS-SDNY
Jennifer L. Brown
CLerk's Office
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: <u>4/15/21</u>

MEMO ENDORSED

Dear Judge Wood:

I write, with the consent of Pretrial Services, to request a modification of Mr. Grandison's bail conditions to expand his travel restrictions to include the District of New Jersey and the District of Connecticut for the purposes of Mr. Grandison's employment. The Government defers to the position of Pretrial Services.

On December 7, 2020, Mr. Grandison was released on the following conditions: a \$100,000 personal recognizance bond secured by two financially responsible persons; home detention enforced by electronic monitoring; pretrial supervision as directed; surrender travel documents and make no new applications; travel restricted to SDNY and EDNY; maintain or seek employment; and defendant not to possess a firearm. On March 19, 2021, Your Honor approved a bail modification to reduce Mr. Grandison's supervision from home detention to a curfew to be enforced by electronic monitoring.

Mr. Grandison's liberty has now been monitored for four months and his Pretrial Services Officer reports that Mr. Grandison has been in full compliance with his conditions of release without incident. Mr. Grandison and his family own and operate an event supplies business which requires them to pick up furniture and supplies from their distributors in New Jersey and Connecticut and deliver to event locations in the tristate area. By expanding his travel privileges, Mr. Grandison will be better able to contribute to and manage his business.

Therefore, I respectfully request that the Court modify Mr. Grandison's conditions of release by extending his travel allowances for purposes of employment to include the District of New Jersey and the District of Connecticut, alongside his standing conditions of a curfew enforced by electronic monitoring.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio
Assistant Federal Defender
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Cc AUSA Alexandra Rothman/ PTSO Marlon Ovalles SO ORDERED: N.Y., N.Y.

4/14/21

Kimba M. Wood

**KIMBA M. WOOD
U.S.D.J.**